

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN FAY and JANICE FAY,

Plaintiffs,

v

Case No.: 2:19-cv-10902
Hon. George Caram Steeh

WARREN HOSPITALITY SUITES,
a Michigan Corporation,

Defendant.

GORDON JOHNSON P30454
Brain Injury Law Group, SC
d/b/a Johnson Law Office
Attorneys for Plaintiffs
212 Whitetail Run Lane
Sheboygan, WI 53081
g@gordonjohnson.com
jayne@tbilaw.com

JOSEPH M. GORMAN
Bar ID: CO 40022
Attorneys for Plaintiffs
Shakeshaft & Gorman Law Firm, LLP
1935 Jamboree Drive, Suite 202
Colorado Springs, CO 80920
(719) 635-5886/fax (719) 635-0966
office@shakeshaftandgormanlaw.com

MICHAEL D. WEAVER P43985
JUSTIN J. HAKALA (P72996)
Plunkett Cooney
Attorneys for Def, Warren
Hospitality Suites, Inc.
38505 Woodward Ave., Suite 100
Bloomfield Hills, MI 48304
(248) 901-4025
mweaver@plunkettcooney.com
jhakala@plunkettcooney.com

**DEFENDANT WARRANT HOSPITALITY SUITES, INC.'S
EXPERT WITNESS DISCLOSURES**

NOW COMES Defendant Warren Hospitality Suites, Inc., by and through its attorneys, Plunkett Cooney, and hereby submits its Expert Witness Disclosures, as follows:

**Disclosure of Retained Experts
Fed. R. Civ. P. 26(a)(2)(B)**

Defendant has retained and may call the following witnesses to present evidence under Federal Rule of Evidence 702, 703 or 705 at time of trial:

1. Jonathan Silver Rutchik, MD, 35 Miller Avenue, #331, Mill Valley, CA 94941 (Neurology and Electromyography, Neurotoxicology, Occupational and, Environmental Medicine);
2. Jose Marcos Lafosse, PhD, Lafosse Neuropsychology, LLC, 4251 Kipling Street, Suite 565, Wheat Ridge, CO 80033 (Neuropsychology)
3. John Alfonsi, 4111 Andover Road West Third Floor, Bloomfield Hills, MI 48302 (Economics);
4. Gaurang Shah, MD, FACR, FASFNR. Professor of Radiology University of Michigan Health System, B2A209 1500 E Medical Center Drive, Ann Arbor, MI 48109 (Neuroradiology)

Defendant will serve available expert reports contemporaneously and outstanding reports as soon they are completed and received.

Disclosure for Non-Retained Experts
Fed. R. Civ. P. 26(a)(2)(C)

Defendant may call the following witnesses, who have not been retained or specially employed, to provide expert testimony in this case and present evidence under Federal Rule of Evidence 702, 703 or 705 at time of trial:

1. Michael Saxerud, OD;

a. The subject matter on which the witness is expected to present evidence:

Dr. Saxerud is expected to testify about the nature and degree of Plaintiffs injuries, disabilities, his medical history, medical progression, and medical prognosis, specifically with regard to hyperbaric medicine and the treatment he provided to them.

b. A summary of the facts and opinions to which the witness is expected to testify:

Dr. Saxerud is expected to testify to the facts and opinions contained within his medical records regarding Plaintiffs and Defendant incorporates those Records by reference.

2. James Tyburski, MD;

a. The subject matter on which the witness is expected to present evidence:

Dr. Saxerud is expected to testify about the nature and degree of Plaintiffs injuries, disabilities, his medical history, medical progression, and medical

prognosis, specifically with regard to hyperbaric medicine and the treatment he provided to them.

b. A summary of the facts and opinions to which the witness is expected to testify:

Dr. Saxerud is expected to testify to the facts and opinions contained within his medical records regarding Plaintiffs and Defendant incorporates those Records by reference.

3. Treating Physicians

Defendant also intends to call Plaintiffs' treating physicians at time of trial as factual witnesses, but does not expect them to provide expert opinion testimony in this case aside from the facts, opinions, conclusions, diagnoses and prognoses that were arrived at in the normal course of Plaintiffs' treatment.

Respectfully submitted,

PLUNKETT ♥ COONEY

Dated: January 14, 2022

By: /s/Justin J. Hakala
Justin J. Hakala (P72996)
Attorney for Defendant
38505 Woodward Avenue, Suite 100
Bloomfield Hills, Michigan 48304
Phone: (248) 594-4281
jhakala@plunkettcooney.com

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2022 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys or parties of record, and I hereby certify that I have sent copies to all non-ECF parties, if any, by first class U.S. Mail.

Respectfully submitted,

PLUNKETT ♥ COONEY

Dated: January 14, 2022

By: /s/Justin J. Hakala
Justin J. Hakala (P72996)
Attorney for Defendant
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Bloomfield Hills, Michigan 48304
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